

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

NADINE LEE,)
)
Plaintiff,)
) CIVIL ACTION NO.
v.)
) 1:21-cv-03858-MLB-WEJ
RICKY L. CLARK, JR., individually)
and in his official capacity as City)
Manager for the City of Jonesboro;)
WILFRED NORWOOD, individually)
and in his official capacity as Interim)
Chief of Police for the City of)
Jonesboro; and THE CITY OF)
JONESBORO, GEORGIA,)
)
Defendants.)

NOTICE OF DEPOSITION

Plaintiff Nadine Lee hereby gives notice that, pursuant to Federal Rule of Civil Procedure 30, she will take the deposition of the City of Jonesboro, Georgia through one or more officers, directors, agents, or other representatives who shall be designated to testify on the City of Jonesboro's behalf regarding all information known or reasonable available to the City of Jonesboro with respect to the subject matters identified in Exhibit A. Plaintiff Nadine Lee requests that the City of Jonesboro provide written notice at least five (5) business days before the

deposition of the name(s) and employment position(s) of the individual(s) designated to testify on the City of Jonesboro's behalf. The deposition shall take place on Thursday, March 31, at 10:00 a.m., or at another time mutually agreed upon by counsel, at the Jonesboro Police Department, 170 S Main St, Jonesboro, GA 30236, or at another location mutually agreed upon by counsel.

The undersigned, in accordance with L.R. 7.1 and 5.1 hereby certifies that the typefont used herein is 14-point Times New Roman font.

This 21st day of March, 2022.

/s/ Andrew C. Salman
Oscar E. Prioleau, Jr.
Georgia Bar No. 588510
Andrew C. Salman
Georgia Bar No. 505006
Prioleau & Milfort, LLC
3800 Camp Creek Parkway SW
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Atlanta, Georgia 30331
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oscar@pmlawteam.com
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Attorneys for Plaintiff Nadine Lee

EXHIBIT A
TO PLAINTIFF'S NOTICE OF DEPOSITION

In accordance with FRCP 30(b)(6), Nadine Lee designates the matters identified below for examination. In construing these topics, all terms shall be construed to encompass as broad a range of information as permitted under the Federal Rules of Civil Procedure.

The deponent(s) shall be prepared to address the following topics:

- I. The City of Jonesboro's personnel policies, employment practices, and rules and systems for managing personnel;
- II. The City of Jonesboro's policies and practices regarding the Family Medical Leave Act, the Families First Coronavirus Response Act, the Emergency Paid Sick Leave Act, and the Emergency Family and Medical Leave Expansion Act;
- III. The City of Jonesboro's policies and practices regarding telecommuting, work from home, and any other social distancing guidelines both immediately before and following the federal declaration of emergency regarding the COVID-19 pandemic;
- IV. The City of Jonesboro's actions and communications between July 2, 2020, and July 20, 2020, regarding Nadine Lee's request for FMLA leave due to lack of childcare because of COVID-19.

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CERTIFICATE OF SERVICE

I certify that on this 21st day of March, 2022, I served Plaintiff's Deposition Notice to Defendant City of Jonesboro by electronic mail to: mrust@grsmb.com and ajoseph@grsmb.com. I further certify that I also placed a copy of the foregoing in the United States Mail in an envelope with adequate postage affixed thereon, properly addressed to:

Michael J. Rust

Alex M. Joseph

Gray, Rust, St. Amand, Moffett & Brieske
950 East Paces Ferry Road NE
Suite 1700
Atlanta, GA 30326

I further certify that the foregoing document was prepared using 14 point Times New Roman font.

This 21st day of March, 2022.

/s/ Andrew C. Salman
Andrew C. Salman, Esq.
Georgia Bar No. 505006